

11:41 am, Jun 23 2023

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF MARYLAND**

AT BALTIMORE  
 CLERK, U.S. DISTRICT COURT  
 DISTRICT OF MARYLAND  
 BY \_\_\_\_\_ Deputy

**IN THE MATTER OF A CRIMINAL  
 COMPLAINT**

Case No. 23-1764 BPG

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Task Force Officer Keith A. Galeano of The Drug Enforcement Administration (DEA),  
 being duly sworn, depose and state as follows:

**INTRODUCTION**

1. This Affidavit is submitted in support of a Criminal Complaint charging Jesus HALL with possession of a firearm by a prohibited person, in violation of 18 U.S.C. § 922(g).

2. I am an “investigative or law enforcement officer . . . of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. I am a Detective Sergeant with the Department of Public Safety and Correctional Services (“DPSCS”) and have been a member since September 2022. I am currently assigned to the Special Operations Unit within DPSCS. Prior to that, I was a member of the Baltimore Police Department (“BPD”) from February 2008 to November 2022. I have successfully completed twenty-three weeks of training in the Baltimore City Police Academy. I have served in the Community Stabilization Unit, the Central District Patrol Division, The Central District Operations, the Central District Drug Enforcement Unit, Operation intelligence Section Special Enforcement Unit and the Criminal Investigations Division’s Overdose Task Force within the Homicide Section, the Anti-Crime Section Strike Force, and I am currently assigned to the Drug Enforcement Administration (“DEA”) Organized crime Drug Enforcement Task Force (“OCDETF”) Strike Force Group III. I

have received approximately forty hours of entry level CDS training through the Baltimore City Police Academy. I have received more than 120 hours of additional specialized narcotics training, through the DEA and the Multijurisdictional Counterdrug Task Force.

3. The statements made in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided to me by other law enforcement officers and (d) the training and experience of myself and other law enforcement agents and officers.

4. This Affidavit is made for the limited purpose of establishing probable cause in support of a Criminal Complaint and contains only a summary of relevant facts. I have not included every fact known to me concerning the entities, individuals, and the events described in this Affidavit, but I do not believe I have omitted any information that would have a tendency to defeat a showing of probable cause.

### **PROBABLE CAUSE**

5. On January 30, 2023, Jesus HALL was arrested by the Maryland Transportation Authority Police and charged in state court with a handgun violation and possession of controlled substances. HALL was subsequently released and placed on electronic home monitoring at his residence located at 806 Kingston Road, Middle River, Maryland ("806 Kingston Road").

6. On February 27, 2023, investigators from the DEA, with the assistance of other law enforcement partners, executed a state search and seizure warrant at 806 Kingston Road. HALL's home monitoring device placed him inside of the residence prior to the search, and upon arrival at the location, investigators found HALL and several other individuals inside of the home.

7. From the second-floor rear bedroom investigators recovered a black, Ruger, Model SR45, .45 caliber ACP, semi-automatic pistol, serial number 380-46049; several cellphones; 38 jugs of suspected crack cocaine<sup>1</sup>; an armored vest; and over \$29,000.00 in U.S. currency in various denominations. HALL's state identification card, his bank/credit cards and men's clothing were found in the second-floor rear bedroom. Accordingly, I believe that the second-floor rear bedroom belonged to HALL.

8. The Ruger pistol was examined and found to be an operable firearm as it defined under federal law. The pistol was manufactured outside the state of Maryland and, therefore, moved in or effected interstate commerce between the time it was manufactured and the time it was recovered by investigator on February 27, 2023. Based on a review of HALL's criminal record, it appears that HALL was previously convicted of Conspiracy to Distribute Cocaine in the United States District Court for the District of Maryland, a crime punishable by more than one year of imprisonment and served more than a year imprisonment. Accordingly, I believe HALL was previously convicted of a crime punishable by more than one year of imprisonment and that he was aware of this prior conviction.

### **CONCLUSION**

9. Based on the foregoing, I submit that there is probable cause to believe that on February 27, 2023, Jesus HALL possessed a firearm after a prior felony conviction in violation of 18 U.S.C. § 922(g).

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<sup>1</sup> The chemical analysis of the suspected crack cocaine remains pending.

WHEREFORE, in consideration of the facts presented, I respectfully request that this Court issue an arrest warrant for Jesus HALL.



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Detective Keith A. Galeano  
Task Force Officer, DEA

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41 this 23<sup>rd</sup> day of June, 2023.



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Honorable Beth P. Gesner  
United States Magistrate Judge

